

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: FRANK TOROK, JOANN TOROK	:	No.: 16-16181-REF
	:	
Debtor.	:	CHAPTER 13
FRANK TOROK, JOANN TOROK,	:	
	:	
Movant,	:	
	:	
v.	:	
	:	<b>HEARING DATE: March 2, 2017</b>
ALLY BANK	,	<b>HEARING TIME: 9:00 a.m.</b>
	:	<b>HEARING PLACE: Courtroom No. 1</b>
	:	<b>Third Floor, the Madison Building</b>
	:	<b>400 Washington Street</b>
Respondent.	:	<b>Reading, PA 19601</b>

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Debtors, FRANK TOROK and JOANN TOROK, by and through her attorney, Matthew Mugno, has filed a Motion to Avoid a Judicial Lien with the court.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this Bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **February 9, 2017**, you or your attorney must do the following:

- a. File an answer explaining your position at

Office of the Bankruptcy Clerk  
The Madison Building  
400 Washington Street  
Reading, PA 19601

If you mail your answer to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- b. Mail a copy of the Movant's attorney

Caffese Law Firm  
803 Main Street  
Stroudsburg PA 18301

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting relief requested in the motion.

3. If opposed, a hearing on the motion is scheduled to be held before the Honorable Richard E. Fehling on March 2, 2017 at 09:00 a.m. in Courtroom Number 1, 3<sup>rd</sup> Floor, United States Bankruptcy Court, The Madison Building, 400 Washington Street, Reading Pennsylvania, 19601. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witness may testify with respect to disputed material factual issues in the matter directed by Fed. R. Bankr. P. 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's Office at 610.208.5040 to find out whether the hearing has been cancelled because no one has filed an answer.

Date: 1.31.16

Respectfully submitted,

/s/ Matthew Mugno  
Matthew Mugno, Esq.  
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